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October 22, 2020

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: *DJ Direct, Inc. v. OMM Imports, Inc. d/b/a/ Zero Gravity, et al.*
Civil Action No.: 1:19-cv-02541 (MKB) (VMS)

Dear Judge Scanlon:

This firm represents the Plaintiff in the above-referenced matter. We submit this letter jointly with counsel for Defendants to report on the status of the case, pursuant to Your Honor's Order of September 22, 2020.

The parties continue to move forward toward settlement of this complicated dispute. The written terms of the Distribution Agreement between the parties appear to be in order, leaving the parties left to complete the Settlement Agreement and Proposed Consent Judgment. Although the parties' technical differences on the Distribution Agreement seems to have been resolved, there are some issues that remain to be worked through on the Settlement Agreement and Consent Judgment.

This past month, counsel for Plaintiff DJ Direct has also been involved in seeking a preliminary injunction on a different case which has been diverting attention away from concluding the settlement of this litigation.

There are no outstanding discovery disputes. Defendant OMM is due to file a response to the Complaint, but the parties believe that will not be necessary.

In order to give the parties sufficient time to finalize this complicated settlement, the parties respectfully request a stay for an additional thirty days (30) period.

Respectfully submitted,

STERN & SCHURIN, LLP

Steven Stern

Steven Stern